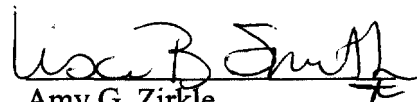


### **CONCLUSION**

MCI, along with all commenting state commissions and numerous exchange carriers who hope to compete in local markets, strongly urges the Commission to expeditiously adopt the performance requirements set out in the Commission's NPRM, with the modifications suggested in MCI's Initial and Reply Comments. In order to ensure that the measurements proposed by the Commission are implemented uniformly and in a timely manner, MCI strongly urges the Commission to adopt them as rules rather than non-binding guidelines. Because the establishment of meaningful performance measurements is so critical, if the Commission chooses not to adopt rules at this time it should use the authority it unquestionably possesses to adopt guidelines, leaving open the opportunity to convert the guidelines to rules if necessary. In addition, in order to avoid rendering the reporting requirements meaningless, the Commission should establish rules -- or at a minimum, guidelines -- concerning performance standards and enforcement mechanisms.

Respectfully submitted,



Amy G. Zirkle

Lisa R. Youngers

Lisa B. Smith

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## CERTIFICATE OF SERVICE

I, Jodie L. Kelley, do hereby certify that copies of the foregoing "Reply Comments of MCI Telecommunications Corporation" were sent via first class mail to the following on July 6, 1998.

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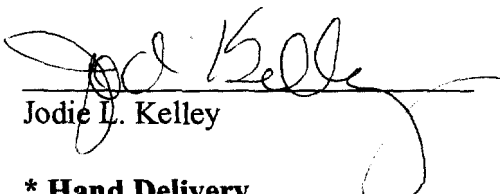
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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Performance Measurements and	)	CC Docket No. 98-56
Reporting Requirements for Operations	)	RM 9101
Support Systems, Interconnection, and	)	
Operator Services and Directory Assistance	)	

**EXHIBITS TO  
REPLY COMMENTS OF MCI TELECOMMUNICATIONS  
CORPORATION**

July 6, 1998

**A**

## EXHIBIT A

### *Summary of Current ILEC Support For Proposed Performance Measurements*

MEASUREMENT	NPRM	SBC	BST	BA/9X	Amer	USW	GTE
Average [Query] Response Time	¶43	G	—	1	✓ *	1	G
Average Completion Interval	¶53	✓*	✓*	1	✓*	1	G
Percentage Due Dates Missed (or Percentage Completed on Time)	¶54	✓*	✓	1	✓*	1	G
Average Coordinated Customer Conversion Interval	¶57	—	—	1	—	1	G
Average Reject Notice Interval	¶60	✓		1	✓*	1	G
Average FOC Notice Interval	¶61	✓		1	✓*	1	G
Average Jeopardy Interval	¶62	—	—	1	—	1	G
Percentage Orders Given Jeopardy Notices	¶63	—	—	1	—	1	G
Average Completion Notice Interval	¶64	✓		1	✓*	1	G
Average Interval for Held Orders	¶66	— *	✓	1	— *	1	G
Percentage of Troubles in “x” Days for New Orders	¶68	✓	✓	1	✓*	1	G
Percent of Order Flow Through	¶72	✓*	✓	1	✓*	1	G
Orders Rejected	¶75	✓	✓	1	✓*	1	G
Average Submissions per Order	¶76	— *	—	1	— *	1	G
Percentage of Accurate Database Updates	¶78	✓*	✓*	1	—	1	G
Percentage of Missed Due Dates (or Average Interval to Update)	¶79	✓*	✓*	1	✓	1	G
Average Time to Restore	¶82	✓	✓*	1	✓*	1	G
Frequency of Troubles in a 30-Day Period	¶84	✓	✓*	1	✓*	1	G
Frequency of Repeat Troubles in 30-Day Period	¶84	✓	✓*	1	✓*	1	G
% of Customer Troubles Resolved Within Estimate	¶85	— *	✓*	1	✓*	1	G
Average Time to Provide Usage Records	¶89	— *	✓*	1	✓*	1	G
Average Time to Deliver Invoices	¶90	—	✓*	1	✓*	1	G
Systems Availability	¶91	✓		1	✓	1	G

MEASUREMENT	NPRM	SBC	BST	BA/9X	AMER	USW	GTE
Center Responsiveness (Speed of Answer)	¶92	✓		1	✓	1	G
OS/DA Average Time to Answer	¶93	✓*	—	1	✓*	1	G
Percent Blocking on Interconnection (Final) Trunks	¶96	✓*	✓	1	✓	1	G
Percent Blocking on Common Trunks	¶100	✓*	✓	1	✓	1	G
Average Time to Respond to Collocation Requests	¶103	✓	✓	1	✓*	1	G
Average Time to Provide a Collocation Arrangement	¶103	✓	✓	1	✓*	1	G
% of Due Dates Missed - Collocation Arrangements	¶103	✓	✓	1	✓*	1	G

**KEY**

- ✓ = Agreement
- ✓\* = Agreement with proposed modifications
- = Disagreement
- \* = Disagreement with proposed alternative
- G = General agreement
- 1 = No specific critique offered





U. S. Department of Justice

Antitrust Division

*Civ. Center Building  
1401 H Street, NW  
Washington, DC 20530*

March 6, 1998

Liam S. Coonan, Esq.  
Senior Vice President and  
Assistant General Counsel  
SBC Communications, Inc.  
175 E. Houston Street  
San Antonio, Texas 78205

Re: SBC Performance Measures

Dear Mr. Coonan:

As part of the Department's commitment to work with all Bell companies on relevant issues in advance of their section 271 applications, the Department of Justice and SBC Communications, Inc. ("SBC") have, as you know, been spending considerable time discussing issues relating to wholesale support processes and performance measures. In that regard, you have provided us with a draft list of proposed performance measures, a list that you have supplemented as our discussions have progressed.

Attachment A is a comprehensive list of performance measures. With the qualifications set forth below, we are satisfied that the performance measures listed in Attachment A, to which SBC has agreed,<sup>1</sup> would be sufficient, if properly implemented, to satisfy the Department's need for performance measures for evaluating a Section 271 application filed in the not-too-distant future.

We appreciate SBC's engagement with the Department on satisfying our competitive assessment in advance of a filing and look forward to working with you on additional related issues. One such issue is whether the performance measures in Attachment A have been "properly implemented," since the majority of our discussions have dealt with the performance measures themselves and since it is upon the actual measures that this letter focuses. As you can appreciate, there are important repercussions that may arise from how the measures are implemented. For example, definitional issues and other details connected with the measures themselves (such as

---

<sup>1</sup> As we have discussed with you, the Department has agreed to narrow variances from Attachment A in light of certain SBC processes and procedures. Specifically, we have agreed that SBC need not provide separate operator services and directory assistance speed-of-answer measurements for branded and unbranded calls and that SBC can limit its 911 measurements to an error-clearing interval measure that is presently under development.

the basis upon which due dates and start and stop times are set in particular measures) could significantly affect the meaning of the data. Thus, because we have not yet reached agreement on issues such as data retention, presentation, and reporting (e.g., disaggregation, reporting intervals and formats), and analysis, we expect that Department staff and SBC will continue to work towards resolution of these issues. We also expect that Department staff and SBC will discuss performance standards and benchmarking, other important aspects of the Department's performance analysis.

Moreover, while we are satisfied at the present time that the measures set out in Attachment A would, if properly implemented, suffice for present purposes, performance measurement is a dynamic area and future developments could necessitate changes in our views of appropriate performance measures. For example, while the measures listed in Attachment A are structured to cover the provision of unbundled network elements, once it becomes clear how unbundled network elements will be provided so as to allow requesting carriers to combine such elements in order to provide a telecommunications service, we may find that other measures are necessary to assess performance in this situation. In addition, the development of new services or new methods of providing existing services could necessitate additional performance measures. Alternatively, through ongoing regulatory proceedings, our own investigation, or otherwise, we might learn of additional risks, and even occurrences, of discrimination of which we were not previously aware. Accordingly, we would expect SBC to implement additional measures or modifications to existing measures should it become apparent to the Department that they are necessary. On the other hand, developments might reveal that certain measures were no longer necessary and could be eliminated.

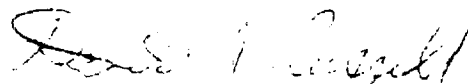
Our satisfaction with the performance measures set out in Attachment A must be placed in its proper context. First, it is limited to the Department's application of its competitive standard. Under section 271, the Department is to evaluate applications for Bell entry using "any standard" the Department believes is appropriate, and the FCC is required to give "substantial weight" to that evaluation. As we have explained, our standard, in addition to the specific statutory prerequisites, requires a demonstration that local markets in a state have been "fully and irreversibly opened to competition," and appropriate performance measures, standards, and benchmarks are important to the Department's application of our competitive standard.

Second, our conclusions relate only to the Department's evaluation of section 271 applications and should not be construed as an expression of the Department's views concerning the appropriate resolution of any federal or state regulatory proceeding relating to performance measures. The FCC and some state commissions have ongoing proceedings considering both performance measures and performance standards, including company-specific and state-specific issues. These proceedings may produce performance measures different from, or in addition to, those described in Attachment A.

I am hopeful that we can resolve the remaining issues expeditiously through our ongoing discussions. I appreciate your cooperation in addressing these issues and look

forward to our continuing mutual efforts. If you have any questions or suggestions regarding these issues, please call.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donald J. Russell". The signature is fluid and cursive, with a prominent initial "D".

Donald J. Russell  
Chief  
Telecommunications Task Force

**PERFORMANCE MEASURES****I. PRE-ORDERING**

1. *Pre-order OSS Availability:* Measures both the hours and days the BOC's pre-order OSSs are available to CLECs and non-scheduled downtime.
2. *Pre-order System Response Times:* Measures, in seconds, the speed with which the CLEC Service Representatives receive information (including rejection and error messages) for processes described below with a customer on the line. These cycle-time measures assume the CLEC has mechanical access to the BOC databases and should be measured in a manner that allows appropriate comparisons to like cycle times experienced by BOC retail service representatives. Times are provided separately for the following functions:
  - a. Address verification
  - b. Request for telephone number
  - c. Request for customer service record (CSR)
  - d. Service and product availability
  - e. Appointment scheduling

**II. ORDERING**

1. *Firm Order Commitment (FOC) Cycle Time:* Measures the average time from CLEC service order submission to BOC response, confirming receipt of a properly formatted and appointed order and committing to complete the order by a specified date. In addition, may be presented as the percentage returned within an agreed upon interval.
2. *Rejected Order Cycle Time:* Measures the average time, from CLEC service order submission to BOC response, for rejecting an incomplete service order or one containing errors. Each submission of an order, up to and including the FOC, requires a response cycle-time result.
3. *Ordering Quality:* The following performance measures are important determinants of service order processing parity or adequacy. Each is important in its own right and provides insights into different aspects of order quality. While the entire set would not be required, Percent Flow Through and either Percent Rejected Orders or Order Submissions per Order are necessary.
  - a. *Percent Rejected Orders:* Measured at the BOC gateway, it is the result of dividing rejected orders by total orders submitted, manually or mechanically. It is an adequacy measure because there are no equivalent BOC analogs. BOC orders are "rejected" via automatic edits before the order leaves the service representative position.
  - b. *Order Submissions per Order:* Measured at the BOC gateway, it is determined by dividing total order submissions by the number of orders receiving a firm order commitment.

- c. *Percent Flow Through*: Measures the percentage of orders that flow from the BOC gateway to acceptance by the BOC service order processor without manual intervention. Orders rejected at the gateway are excluded.
- 4. *Ordering OSS Availability*: Measures both the hours and days the BOC's ordering OSSs are available to CLECs and non-scheduled downtime.
- 5. *Ordering Center Availability*: Reports both the hours and days of operation of the BOC ordering center.
- 6. *Speed of Answer-Ordering Center*: Measures the average time to reach a BOC service representative.

### III. PROVISIONING

- A. *Service Provisioning Interval*: Measures the time from customer request for service to completion when the appointment is offered by the BOC, either from a common appointment database, generally used in a resale environment, or by agreed-to appointment intervals, more commonly used in a UNE environment. Service Provisioning Interval should be measured both as a mean, or average interval, and as a percent over a standard interval. Next available appointments offered from the work schedule OSS and expedited requests should be included for measurement; customer-requested due dates longer than the offered appointment should be excluded.
  - 1. *Average Service Provisioning Interval*: Measured in days from end-user request to order completion and counted separately for dispatched and non-dispatched orders.
  - 2. *Percent Service Provisioned Out of Interval*: Measures the percentage of service orders completed in more than an agreed upon number of days. Ideally, measured incrementally by day. For example, orders completed in more than 3 days, 4 days, 5 days, and 6 days. This performance measure depicts the tail of the interval curve. Combined with the Average Installation Interval, portrays a robust picture of provisioning cycle time.
- B. *Other Provisioning Measures*
  - 1. *Percent Interconnection Facilities Provisioned Out of Interval*: Measures the percentage of interconnection facilities (switched trunks and dedicated circuits) provisioned in more than an agreed upon number of days.
  - 2. *Percent Missed Appointments-Company Reasons*: Order completion is measured against the original CLEC-requested due date. No due date changes may be made unless explicitly specified by the end user or explicitly agreed to by the CLEC and the BOC. Orders missed for company reasons-load, facilities, or other-are included. Orders missed due to customer reasons are not counted as a miss for purposes of this measure.
  - 3. *Percent New Service Failures*: Measures the number of trouble reports on newly provisioned service within an agreed number of days of the original trouble. Studies have shown high correlation between provisioning errors and trouble reports occurring within 10 days and lower correlations beyond 10 days.

4. *Completed Service Order Accuracy*: Measures the extent to which orders are completed by the BOC as ordered by the CLEC.
5. *Orders Held for Facilities*: Measures service orders not completed by the original due date because of a lack of network facilities (including loops and central office equipment) in terms of (a) the average time between the original due date and the final completion date, and (b) the number of pending orders, as of the report date, held beyond a specified period (usually 30 days) following the original due date.
6. *Average Completion Notice Interval*: Measures the average time from order completion to notification of the CLEC for orders submitted on a mechanized basis.

#### IV. MAINTENANCE

##### A. Trouble Reporting & Clearance

1. *Trouble Report Rate*: Measured as the number of trouble reports per customer or access line per month.
2. *Percent Repeat Reports*: Measured as the percentage of end-user troubles on the same access line within an agreed number of days of the original trouble. Studies have shown high correlation between repair errors and repeat reports occurring within 10 days and lower correlations beyond 10 days.
3. *Percent Out of Service Over 24 Hours*: Measured as a percentage of out-of-service troubles cleared within 24 hours.
4. *Percent Missed Appointments*: Measures the percentage of trouble reports cleared after the promised appointment. Requires that appointment times, once set, cannot be changed except by the end user.
5. *Mean Time to Repair*: Measured as the average interval from trouble report to clearance.
6. *Interconnection Facilities Restored Out of Interval*: Measures the percentage of interconnection facilities (switched trunks and dedicated circuits) reported out of service and restored after an agreed-to interval. May also be measured and reported as an average interval.
7. *Maintenance OSS Availability*: Measures both the hours and days the BOC's maintenance OSSs are available to CLECs and non-scheduled downtime.
8. *Maintenance Center Speed of Answer*: Measures the average time to reach a BOC repair service representative.

##### B. Network Quality

1. *Percent Blocked Calls*: Measures trunking grade (quality) of service. Should be provided separately for the following types of trunks:
  - a. ILEC End Office to CLEC End Office Trunk Groups
  - b. ILEC Tandem to CLEC End Office Trunk Groups
  - c. ILEC Tandem to and from ILEC End Office Trunk Groups

## V. BILLING

1. **Bill Timeliness:** Measures the percentage of billing records delivered within an agreed-to interval. Should be provided for the following billing information provided to CLECs:
  - a. **Daily Usage File (DUF):** Measures, from message creation to the availability of the usage information to the CLEC, the percentage of DUF's provided within the interval.
  - b. **Wholesale Bill:** Measures the percentage of wholesale bills issued within an agreed-to number of days following the end of the billing cycle.
2. **Bill Completeness:** Measures the percentage of complete billing records for usage charges, recurring charges, and non-recurring charges provided to CLECs. Should be measured after bills are released. Under approved conditions, sufficiently robust pre-release test and audit procedures could substitute for a post-release audit.
  - a. **Usage:** Measures unbillable usage and usage from the current bill cycle not included on the current wholesale bill.
  - b. **Recurring Charges:** Measures current bill cycle recurring charges not included on the current wholesale bill.
  - c. **Non-Recurring Charges:** Measures non-recurring charges completed in the current bill period not included on the current wholesale bill.
3. **Bill Accuracy:** Measures the percentage of accurate billing records for usage charges, recurring charges, and non-recurring charges provided to CLECs. Should be measured after bills are released. Under approved conditions, sufficiently robust pre-release test and audit procedures could substitute for a post-release audit.

## VI. OTHER

1. **Operator Services Toll Speed of Answer:** Measures raw interval in seconds or as a percentage under a set objective. Should be provided separately for unbranded and branded service.
2. **Directory Assistance Speed of Answer:** Measures raw interval in seconds or as a percentage under a set objective. Should be provided separately for unbranded and branded service.
3. **911 Database Update Timeliness and Accuracy:** Measures the percentage of missed due dates of 911 database updates and the percentage of accurate updates.

c

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

At a session of the Public Service  
Commission held in the City of  
Albany on February 18, 1998

COMMISSIONERS PRESENT:

John F. O'Mara, Chairman  
Maureen O. Helmer  
Thomas J. Dunleavy

CASE 97-C-0139 - Proceeding on Motion of the Commission to  
Review Service Quality Standards for Telephone  
Companies

ORDER APPROVING INTERIM GUIDELINES FOR  
CARRIER-TO-CARRIER PERFORMANCE STANDARDS AND REPORTS

(Issued and Effective March 16, 1998)

BY THE COMMISSION:

INTRODUCTION

On February 5, 1997, we instituted this proceeding to assess whether our service quality standards are appropriate for current and future market conditions, whether those conditions warrant relaxation of our oversight, and whether inter-carrier service quality and network reliability standards are needed.<sup>1</sup> The proceeding was structured in four modules: End User Standards, Uniform Measurements, Carrier-to-Carrier standards, and Network Reliability. This order addresses the Carrier-to-Carrier standards.

The proceeding incorporated a collaborative process, a modified negotiated regulation process, whereby smaller working groups met between monthly Plenary Meetings to explore the issues and to determine whether new standards were needed. Their consensus agreements were brought for approval to the Plenary Group. The goal was to produce a consensus document outlining

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<sup>1</sup> Case 97-C-0139, Order Instituting Proceeding (issued February 5, 1997).

agreement on as many issues as possible for later presentation to us.

The attached Interim Guidelines for Carrier-to-Carrier Standards and Reports ("Interim Guidelines") is the consensus product of the Carrier-to-Carrier Working Group. The Interim Guidelines, a comprehensive document, include baseline standards, and their definitions, the measurement methodology, reporting levels, and product intervals.

#### Discussion

We approve use of the Interim Guidelines by the parties on a trial basis while they monitor the implementation of the interim guidelines, analyze reported data, and evaluate of the need for further modifications. This trial period will extend through December 1998. Thereafter, in the first quarter of 1999, the participants should submit their final recommendations to us, including whether the Interim Guidelines (including any modifications) should be adopted as rules and regulations.

#### The Commission orders:

1. The Interim Guidelines attached to this order are hereby approved for implementation for a trial period extending through December 1998.
2. These Interim Guidelines may be modified, as needed, by the Carrier-to-Carrier Working Group in accord with their consensus process.
3. The participants in the Carrier-to-Carrier and Plenary Working Groups shall submit their final recommendations concerning the Interim Guidelines in the first quarter of 1999.
4. This proceeding is continued.

By the Commission,

(SIGNED)

JOHN C. CRARY  
Secretary

**CASE 97-C-0139**

**Interim Guidelines**

**Carrier to Carrier Performance Standards and Reports**

**TRIAL PERIOD**

*January - December 1998*

**CASE 97-C-0139**

**Interim Guidelines**

**Carrier to Carrier Performance Standards and Reports**

**TRIAL PERIOD**

*January - December 1998*

**Introduction:**

These Interim Guidelines were created by a consensus process through the New York State Public Service Commission Proceeding to Review Service Quality Standards of Telephone Companies (Case 97-C-0139). The Guidelines and the accompanying documents (referred to collectively herein as "The Guidelines") were developed by the Carrier-to-Carrier working group in this proceeding to obtain the data and experience necessary to monitor Carrier-to-Carrier performance and to determine the need for the Commission to adopt formal rules.

The Guidelines will apply during the data gathering phase of this proceeding and are not meant to replace or supersede interconnection agreements among carriers or any continuing negotiations concerning performance measurements, standards, reporting requirements or remedies, including any other duties or obligations imposed by this Commission or the Federal Communications Commission. The Carrier-to-Carrier Working Group will meet throughout 1998 to monitor performance and to modify The Guidelines as necessary. The Working Group will make a recommendation at the end of the year whether The Guidelines should be further modified and later adopted as Commission rules, or remain as industry guidelines.

Baseline standards contained in this package apply to Bell Atlantic - New York ("BA-NY") and Frontier Telephone of Rochester, Inc. ("FTR").<sup>1</sup> For other Incumbent Local Exchange Carriers ("LECs"), these Guidelines should serve as a basis for future negotiations between requesting carriers and incumbent LECs, giving due consideration to each party's specific needs and capabilities. The Guidelines do not establish a presumption for measurement and/or reporting of any specific metric as detailed herein for the other LECs. However, each such LEC will provide services at parity to those provided to its own end user customers assuming normal quantities of service ordered, and will report those service quality measurements currently reported to the Public Service Commission disaggregated between retail and wholesale markets.

The Guidelines include the following:

- Performance Standards and Reports<sup>2</sup>: a comprehensive document including explanations of the measurement methodology, definitions of standards, reporting levels, geography covered, current product intervals, and cross references to the FCC Order Approving the Bell Atlantic/NYNEX Merger and to LCUG recommended measures.
- Competitive Local Exchange Carriers ("CLEC") Forecast Guide for Interconnection Trunks. ( Appendix A)
- The carrier consensus working document: a working document used to develop the performance standards and reports included in the Interim Guidelines. (Appendix B)

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<sup>1</sup> FTR does not provide unbundled elements and flow-through orders. FTR will develop UNE products when a request is received and will explore additional reporting during the trial period.

<sup>2</sup> Any CLEC not a member of the Carrier to Carrier working group that wants to obtain reports produced pursuant to the Guidelines must contact the Account Manager that the incumbent LEC has designated to make the appropriate arrangements.

- A statistical tool for evaluating parity performance (Appendix C)
- A Forum to Resolve Questions of Interpretation and Process and Recording Keeping including recording keeping procedures.<sup>3</sup> ( Appendix D)

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<sup>3</sup>Root cause analysis will always be a key tool in evaluation of performance. Data from root cause analysis will be the subject of discussion throughout the year.

**Interim Guidelines for Carrier to Carrier Performance Standards & Reports**  
**New York State**  
**January - December 1998**

**Pre-Ordering:**

**Metric A - Response Time OSS Interface:**

"Response time" is defined as time (in seconds) that elapses from the submission of a query request to the receipt of a response by the requesting carrier (at the access platform for CLECs and directly to OSS for BA). (Does not apply to BA-NY GUI interface).

**BA-NY Notes:**

**Methodology:** BA-NY: Sample via simulation of Service Representatives' (both BA and CLEC) requests using Sentinel System. Ten Transactions per hour per transaction type, Monday - Friday 8 AM to 5 PM. Note: Telephone number will be sampled at 1 transaction per hour due to potential impact on telephone number inventory.

**Other Pre-Ordering,** an FCC reported metric, is defined as the aggregate of four pre-ordering functions: (1) Due Date Availability, (2) Address Validation, (3) Product Service Availability (Feature Function) and (4) Telephone Number Availability.

**FTR Notes:**

Parity if CLEC uses direct access to OSS.

**LCUG Reference:** LCUG P01

**Reported Sub-metrics :**

**Report Level:**

Geography: New York State

Reported for:

BA Retail

CLEC aggregate

**BA-NY Reports:**

Average Response Time:	<u>BA-NY Standard</u>	<u>Reported Product Groups</u>	<u>FCC/BA Measure<sup>1</sup></u>
1. Customer Service Record	Parity with Retail plus not more than 4 seconds	• OSS	FCC
2. Other Pre-Ordering	Parity with Retail plus not more than 4 seconds	• OSS	FCC
3. Due Date Availability	Parity with Retail plus not more than 4 seconds	• OSS	
4. Address Validation	Parity with Retail plus not more than 4 seconds	• OSS	
5. Product and Service Availability	Parity with Retail plus not more than 4 seconds	• OSS	
6. Telephone Number Availability and Reservation	Parity with Retail plus not more than 4 seconds	• OSS	

<sup>1</sup> Measures included in FCC Merger Order on Bell Atlantic Merger